

The Honorable Christopher M. Alston
Chapter 11
Hearing Date: May 3, 2019
Hearing Time: 9:30 a.m.
Response Date: April 26, 2019
Hearing Location: Seattle

UNITED STATES BANKRUPTCY COURT
WESTERN DISTRICT OF WASHINGTON AT SEATTLE

In re:

NORTHWEST TERRITORIAL MINT,
LLC,

Debtors.

Case No: 16-11767-CMA

NOTICE AND STIPULATION
GRANTING RELIEF FROM STAY
TO APPLY PRE-PETITION RETAINER

NOTICE

PLEASE TAKE NOTICE that the STIPULATION GRANTING RELIEF FROM STAY
TO APPLY PRE-PETITION RETAINER is SET FOR HEARING as follows:

JUDGE:	The Honorable Christopher M. Alston	TIME: 9:30 a.m.
PLACE:	Room 7206 United States Bankruptcy Court 700 Stewart Street Seattle, WA 98101	DATE: May 3, 2019

IF YOU OPPOSE the Stipulation and proposed Order you must file your written response
with the court clerk and deliver a copy to the undersigned NOT LATER THAN the RESPONSE
DEADLINE, which is April 26, 2019.

IF NO RESPONSE is timely filed and served, the Court may, in its discretion, GRANT THE
MOTION for entry of an order granting the Stipulated Relief from Stay prior to the hearing without
further notice, and strike the hearing.

NOTICE AND STIPULATION GRANTING
RELIEF FROM STAY TO APPLY PRE-PETITION
RETAINER - 1

#1236171 v1 / 47727-001

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STIPULATION

Chapter 11 Trustee Mark Calvert (“Trustee”), through his counsel David C. Neu, and Karr Tuttle Campbell, P.S. (“KTC”) through its shareholder Diana K. Carey, hereby stipulate pursuant to 11 U.S.C. § 362(d)(1) of the Bankruptcy Code and Bankruptcy Rule 4001(a) to entry of an order granting KTC relief from stay to allow KTC to apply a pre-petition retainer as follows:

1. This chapter 11 case was filed April 1, 2016, and the Trustee was duly appointed.

2. On November 5, 2015, KTC received an advance deposit from NWTM in the amount of \$10,000 (“Advance Fee Deposit”). The Advance Fee Deposit has been held in trust by KTC since that date.

3. Prior to commencement of the bankruptcy, KTC provided services to the Debtor, Northwest Territorial Mint (NWTM”). At the time of the bankruptcy filing, KTC had unpaid invoices for services to NWTM in the total amount of \$9,871.55, as evidenced by the five invoices attached to the Declaration of Diana K. Carey. (Note: the invoices total \$9,903.07 but have been reduced by \$31.52 to eliminate late charges.) These services primarily related to a compliance audit and report and a corporate matter.

4. KTC has a possessory attorney’s lien on the Advance Fee Deposit pursuant to RCW 60.40.010(b) and RCW 60.40.030.

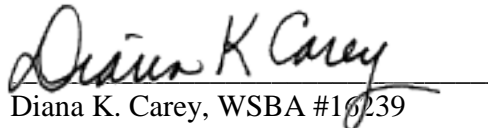
5. The Trustee and KTC stipulate to relief from the automatic stay pursuant to 11 U.S.C. 362(d)(1) for cause and Rule 4001(a), to allow KTC to apply the Advance Fee Deposit to the outstanding invoices in the amount of \$9,871.55 and remit the remainder of the Advance Fee Deposit (\$128.45) to the Trustee.

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1 A proposed Order accompanies this motion.

2 Dated this 2nd day of April 2019.

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Diana K. Carey, WSBA #16239

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9 /s/ David C. Neu

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